

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

| | | |
|-----------------------------|---|------------------------------|
| Larry J. Schultz and, |) | Bankruptcy No. 17-22532-CMB |
| Joyce E. Schultz, |) | |
| |) | |
| Debtors. |) | Chapter 13 |
| |) | |
| Ronda J. Winnecour, Trustee |) | |
| Movant, |) | Document No. |
| v. |) | |
| |) | Related to Doc No. 80 and 81 |
| Larry J. Schultz and, |) | |
| Joyce E. Schultz, |) | |
| |) | |
| Respondents. |) | |

NOTICE OF PROPOSAL TO CURE PLAN DEFAULTS

1. Debtor(s) propose to cure the plan default as pleaded in the Trustee's Certificate of Default.
2. The cure shall be effected as follows: **Debtors shall cure the arrears via lump sum payment from funds that the Debtors' anticipate receiving from a pending inheritance.**
3. All Objections to the proposed cure must be filed and served by no later than 21 days after the date of this Notice upon the Debtor(s) and Chapter 13 Trustee. Untimely Objections will not be considered. Any creditor who files a timely Objection to the cure must appear at the scheduled Conciliation Conference on the proposed cure.
4. A virtual (via Zoom) Conciliation Conference on the proposed cure will be held on September 29, 2022, at 10 a.m., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <http://www.ch13pitt.com/calendar/> several days before the meeting. Parties are expected to familiarize themselves with the Trustee's website at <http://www.ch13pitt.com/> and to comply with the procedures set forth at that site for conference participation.

RESPECTFULLY SUBMITTED, this 29th day of August, 2022.

/s//Brian C. Thompson, Esquire
Brian C. Thompson
PA ID: 91197
Thompson Law Group, P.C.
125 Warrendale-Bayne Road, Suite 200
Warrendale, PA 15086
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com